

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

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OLDILON S. CELESTIN, WIDMIR ROMELIEN, MARIE
LUCIE ST VIL, GOREETTIE ST VIL, JEANNETTE VALEUS,
GUETTY FELIN and HERVE COHEN, on behalf of all others
similarly situated,

Case No. 18-CV-7340 (LDH) (PK)

Plaintiffs,

v.

**Served on Plaintiffs via ECF on
March 1, 2024**

MICHEL JOSEPH MARTELLY, JOCELERME PRIVERT,
JOVENEL MOISE, THE WESTERN UNION COMPANY,
d/b/a Western Union Holdings, Inc., Western Union Financial
Services, Inc., and through other subsidiaries and affiliates,
CARIBBEAN AIR MAIL, INC., d/b/a CAM, UNIBANK, S.A.,
UNITRANSFER USA, INC., UNIGESTION HOLDINGS, S.A.,
d/b/a DIGICEL HAITI, NATCOM S.A. and THE
GOVERNMENT OF HAITI,

Defendants.

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NOTICE OF MOTION TO STRIKE AND FOR SANCTIONS

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Defendants Unibank, S.A. and Unitransfer USA, Inc.'s Motion to Strike and for Sanctions, and all prior papers and proceedings had herein, the undersigned hereby moves before the Honorable LaShann DeArcy Hall, United States District Judge, at a date and time to be determined, in Courtroom 4H North of the United States District Court for the Eastern District of New York, 225 Cadman Plaza East, New York, New York 11201, for an Order imposing sanctions as against Plaintiffs, pursuant to the Court's inherent authority.

PLEASE TAKE FURTHER NOTICE that opposing affidavits and memoranda of law, if any, must be served within fourteen (14) days of service hereof.

Dated: March 1, 2024
New York, New York

Respectfully submitted,

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